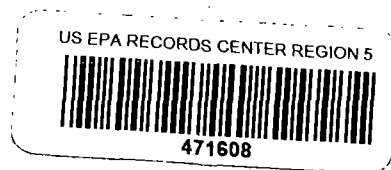


FRC
03/17/98



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF REGIONAL COUNSEL
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FACSIMILE TRANSMITTAL FORM

DATE: 3/17/98
FAX RECIPIENT: Frank Biros
DEPT/FIRM/AGENCY: DOJ
FAX NUMBER: 202.616.6584

FAX SENDER: Kathleen Schnieders, Assistant Regional Counsel
AGENCY: U.S. EPA, Office of Regional Counsel
TELEPHONE: 312.353.8912
FAX: 312.886.0747

SUBJECT: Albion-Sheridan
NUMBER OF PAGES: 3 including the cover sheet

COMMENTS: I've attached a copy of Leah Evison's verification as well as a correction she made to the interrogatories. I'm sending the original verification, along with the rest of the goodies, tomorrow, copy center permitting.

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TRANSMISSION REPORT

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1	DOJ	3-17-98 4:39PM	0'52"	3/ 3	EC	COMPLETED 14400

TOTAL 0:00'52" 3

NOTE:

No. : OPERATION NUMBER 48 : 4800BPS SELECTED EC : ERROR CORRECT G2 : G2 COMMUNICATION
PD : POLLED BY REMOTE SF : STORE & FORWARD RI : RELAY INITIATE RS : RELAY STATION
MB : SEND TO MAILBOX PG : POLLING A REMOTE MP : MULTI-POLLING RM : RECEIVE TO MEMORY

VERIFICATION

The undersigned, being first duly sworn, states that the facts and allegations of the foregoing Complaint are true and correct to the best of her knowledge. To the extent the undersigned has relied on information from others, she believes that information to be true and reliable.

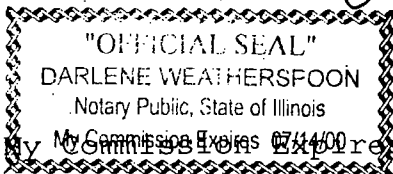
Leah Evison

Leah Evison
Remedial Project Manager
U.S. Environmental Protection Agency

Leah Evison came before me this 17th day of March, 1998, and, after being duly sworn, did state that the above information is true and correct to the best of her knowledge.

Darlene Weatherspoon

NOTARY PUBLIC



My Commission Expires: 7/14/00

DRAFT

Notwithstanding and without waiving these objections, Jon Peterson and Leah Evison, ^{Remedial Project}~~Regional Program~~ Managers, will testify that the United States' response costs are not inconsistent with the National Contingency Plan.

INTERROGATORY NO. 18:

18. Identify all witness statements, interviews and depositions taken by, for or provided to Plaintiff or U.S. EPA with regard to the Site.

RESPONSE:

18. The following persons were deposed on the dates indicated by U.S. EPA personnel in the mater of the Albion-Sheridan Township Landfill.

1. Deposition of William Rieger on June 4, 1992.
2. Deposition of Arlo Wilkerson on May 24, 1990;
3. Deposition or Lloyd Mosher on July 26, 1991;
4. Deposition of Vernon Wainwright on June 3, 1992;
5. Deposition of Donald Hull on June 4, 1992;

The United States attaches copies of the deposition transcripts to these discovery responses.

INTERROGATORY NO. 19:

19. As to any of the accompanying Requests to Admit which Plaintiff does not unequivocally admit, identify all facts, reasons, documents and persons with knowledge to support Plaintiff's denial of the Request to Admit.